

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE WELLS
)	
v.)	<u>MOTION OF DEFENDANTS, SAP</u>
)	<u>AMERICA, INC. AND SAP AG, INC.</u>
SAP AMERICA, INC., et al.)	<u>FOR APPEARANCE BY COUNSEL</u>
)	<u>PRO HAC VICE</u>
Defendants.)	
)	

Defendants, SAP America, Inc. and SAP AG (collectively referred to herein as the “SAP Defendants”), by and through their undersigned counsel, respectfully move this Honorable Court, pursuant to Local Rule 83.5(h), for an Order permitting Thomas S. Downie to appear in the above captioned matter as counsel for the SAP Defendants.

In support of this Motion, counsel for the SAP Defendants state as follows:

1. The SAP Defendants are presently represented by Hugh E. McKay, Leo M. Spellacy, Jr. and Charles W. Zepp of the law firm of Porter Wright Morris & Arthur LLP. Messrs. McKay, Spellacy and Zepp are members of the bar of the State of Ohio, and are members of the bar of this Court, and maintain an office for the practice of law in Cleveland, Ohio.

2. Petitioner Thomas S. Downie has been and is currently a member in good standing of the Bar of the Commonwealth of Pennsylvania (2004) and the United States District Court for the Eastern District of Pennsylvania (2008).

3. Mr. Downie is an associate at Drinker Biddle & Reath LLP, located at One Logan Square, 18th and Cherry Streets, Philadelphia, PA, 19103. Mr. Downie's telephone number is (215) 988-3329 and facsimile number is (215) 988-2757. Mr. Downie's email address is thomas.downie@dbi.com. Mr. Downie's Pennsylvania bar registration number is 92493.

4. Attached as Exhibit A is an affidavit of Mr. Downie in support of this Motion.

Upon his admission *pro hac vice*, Mr. Downie will be associated with the undersigned members of the Bar of this Court.

Dated: April 29, 2009

Respectfully submitted,

/s/Leo M. Spellacy, Jr., Esq.

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Attorneys for Defendants,

SAP America, Inc. and SAP AG

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2009, a copy of foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Leo M. Spellacy, Jr.

One of the Attorneys for Defendants SAP America,
Inc. and SAP AG